CUE 04-0027

OMB Control # 2060-0482

For EPA Use Only ID # _____

SECTOR _____

# Worksheet 5. Application Summary

This worksheet will be posted on the web to notify the public of requests for critical use exemptions beyond the 2005 phase out for methyl bromide. Therefore, this worksheet cannot be claimed as CBI.

1. **Consortium Name:** Pet Food Institute
2. **Location:** United States
3. **Crop:** Pet Food
4. **Pounds of Methyl Bromide Requested** 2007 99,000 lbs.
5. **Volume Treated with Methyl Bromide** 2007 81,000 (1,000 cu ft)
6. **If methyl bromide is requested for additional years, reason for request:**

**No technically or economically feasible alternatives exist for pest control within pet food manufacturing plants.**

| | | | | | |
|---|---|---|---|---|---|
| 2006 | 106,000 | lbs. | Volume Treated | 78,000 | (1,000 cu ft) |
| 2007 | 99,000 | lbs. | Volume Treated | 81,000 | (1,000 cu ft) |
| 2008 | 97,000 | lbs. | Volume Treated | 79,000 | (1,000 cu ft) |

Place an "X" in the column(s) labeled "Not Technically Feasible" and/or "Not Economically Feasible" where appropriate. Use the "Reasons" column to describe why the potential alternative is not feasible.

| Potential Alternatives | Not Technically Feasible | Not Economically Feasible | Reasons |
|---|---|---|---|
| Phosphine alone and in combination | X | X | Phosphine is not a feasible alternative because of the risks posed to facilities and equipment due to corrosion. In facilities where production schedules are full, increased downtime would also increase the cost of Phosphine use over MBr significantly |
| Heat | X | X | Heat treatment is not feasible in every facility due to the need to empty facilities entirely of ingredients, products and packaging materials. In addition, the increased costs from extended downtime are prohibitive. |
| sulfuryl fluoride (ProFume) | X | X | ProFume is not approved for use in United States pet food facilities by the US Environmental Protection Agency yet. Even if it was approved, the label would require the removal of some infested ingredients and products from the fumigation site (because tolerances are not established) which negates the usefulness of the fumigant. Also, ProFume fumigations with similar results to methyl bromide fumigations would probably cost more than four times the cost of a methyl bromide fumigation. |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |